

MEMO ENDORSED

HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 3/4/2025

A motion is not the appropriate mechanism for seeking discovery from Defendant. As Plaintiff has been told repeatedly, the parties can engage in discovery, if necessary, once Defendant's pending motion to dismiss is resolved by the Court. The Clerk of Court is directed to terminate the gavel at ECF No. 134.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Joseph Johnson

Write the full name of each plaintiff or petitioner.

Case No. 23 CV 1156

-against-

Starwood Hotels & Resorts Worldwide LLC.

Write the full name of each defendant or respondent.

NOTICE OF MOTION

FRCP (26) Audio & Video GM verbal threats to plaintiff, allegedly off post in Lower Lobby of the hotel. 02-26-2025

PLEASE TAKE NOTICE that Plaintiff Joseph Johnson
 plaintiff or defendant name of party who is making the motion

requests that the Court: Apply FRCP 26. GM make verbal threats directed at me for being in the lower lobby: Retaliatory threats from a GM is unlawful & there is no job description for hotel units regarding the condition: please read attachments submitted; I recently ask for resignation of General Manager & he verbally make threats just a days later after I reported him. Violation SDNY Labor Law Section 740: Retaliatory acts by GM lower lobby.

Briefly describe what you want the court to do. You should also include the Federal Rule(s) of Civil Procedure or the statute under which you are making the motion, if you know.

In support of this motion, I submit the following documents (check all that apply):

- ☐ a memorandum of law
- ☐ my own declaration, affirmation, or affidavit
- ☐ the following additional documents:

02/27/2025

Dated

Joseph Johnson

Name

151 Country Club Ln.

Address

201-240-0134

Telephone Number (if available)

Joseph Johnson

Signature

Prison Identification # (if incarcerated)

Pomona

City

NY

State

10970

Zip Code

pencilerj@yahoo.com

E-mail Address (if available)